

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.,
Plaintiffs,
- against -
ARAB BANK, PLC,
Defendant.
CV-04-2799 (BMC)(VVP)
and all related cases¹

JOINT SUBMISSION BY ALL PARTIES

In accordance with the Court's direction at the November 7, 2014 status conference, all parties make this joint submission setting forth their positions and proposals regarding anticipated damages trials.

- (1) The parties are unable to agree upon a mutually-acceptable framework for the damages phase of this case.
- (2) The parties decline, in the alternative, to consent to the district court establishing the parameters for assessing damages by a Special Master.
- (3) Plaintiffs' proposals are set forth in Exhibit A.
- (4) Defendant's proposal is set forth in Exhibit B.

Dated: December 5, 2014

Respectfully submitted,

OSEN LLC
SAYLES WERBNER
MOTLEY RICE LLC
ZUCKERMAN SPAEDER LLP

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¹ *Title v. Arab Bank, PLC*, No. CV-04-5449 (E.D.N.Y. 2004) (BMC) (VVP); *Almog v. Arab Bank, PLC*, No. CV-04-5564 (E.D.N.Y. 2004) (BMC) (VVP); *Coulter v. Arab Bank, PLC*, No. CV-05-365 (E.D.N.Y. 2005) (BMC) (VVP); *Afriat-Kurtzer v. Arab Bank, PLC*, No. CV-05-388 (E.D.N.Y. 2005) (BMC) (VVP); *Bennett v. Arab Bank, PLC*, No. CV-05-3183 (E.D.N.Y. 2005) (BMC) (VVP); *Roth v. Arab Bank, PLC*, No. CV-05-3738 (E.D.N.Y. 2005) (BMC) (VVP); and *Weiss v. Arab Bank, PLC*, No. CV-06-1623 (E.D.N.Y. 2006) (BMC) (VVP).